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Attorneys for Plaintiff

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,	)	Case No. 12-CR- 0420 EMC
	)	
Plaintiff,	)	STIPULATION AND [PROPOSED]
	)	ORDER EXCLUDING TIME
v.	)	
	)	
KARIM ISKANDER BAYYOUK,	)	
	)	
Defendant.	)	

WHEREAS, on June 26, 2012, the defendant, Karim Iskander Bayyouk, appeared pursuant to a Summons and was arraigned in this matter before Magistrate Judge Nathanael Cousins and the case was adjourned to September 10, 2012 before Judge Ware;

WHEREAS, on June 28, 2012, counsel for the defendant sent a letter to the government requesting Rule 16 discovery in this case;

WHEREAS, on June 29, 2012, the United States began its production of approximately 937,000 pages of documents and other materials to counsel for the defendant;

WHEREAS, on July 3, 2012, Judge Cousins issued an Order excluding time for the purposes of the defendant's speedy trial rights from July 3, 2012 to September 10, 2012;

STIPULATION AND [PROPOSED] ORDER EXCLUDING TIME  
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1 WHEREAS, on July 9, 2012, the United States filed a Notice of Related Case;  
2 WHEREAS, on July 18, 2012, the District Court issued an Order that this case was  
3 related to other cases pending before Judge Chen and assigned the case to Judge Chen;  
4 WHEREAS, on July 30, 2012, Judge Chen ordered that the initial appearance be re-  
5 scheduled for September 26, 2012;  
6 WHEREAS, on September 26, 2012, the initial appearance was held before the District  
7 Court and the Court made a finding that time should be excluded for purposes of the defendant's  
8 speedy trial rights until October 31, 2012;  
9 WHEREAS, on October 31, 2012, the United States filed its Motion for a Joint Trial of  
10 Separate Cases and the Court conducted a hearing in which the Court made a finding that time  
11 should be excluded for purposes of the defendant's speedy trial rights until December 19, 2012;  
12 WHEREAS, counsel for the defendant has advised the defendant about his right to a  
13 speedy trial and the defendant agrees that his counsel needs additional time to review the  
14 discovery in this matter;  
15 WHEREAS, the parties agree that the exclusion of time under the speedy trial rules from  
16 September 10, 2012 until December 19, 2012 is appropriate because (1) defense counsel requires  
17 reasonable time for effective preparation, taking into account the exercise of due diligence; (2)  
18 this exclusion serves the ends of justice and outweighs the best interest of the public and the  
19 defendant in a speedy trial; and (3) the Court has already made findings, as described above, that  
20 are consistent with this proposed form of order;  
21 WHEREAS, defendant, Karim Iskander Bayyouk, consents to the exclusion of time from  
22 September 10, 2012 until December 19, 2012;  
23 THEREFORE, it is hereby stipulated by and between the parties, through their respective  
24 counsel of record, that the period of time from September 10, 2012 until December 19, 2012  
25 shall be excluded in computing the time within which the trial of the offenses alleged in the  
26 Indictment must commence under Title 18, United States Code, Section 3161.

27  
28 STIPULATION AND [PROPOSED] ORDER EXCLUDING TIME  
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1 DATED: November 26, 2012

MELINDA HAAG  
United States Attorney

2 /s/  
3

4 Adam A. Reeves  
5 Assistant United States Attorney

6 DATED: November 26, 2012

7 /s/  
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9 Brian H. Getz, Esq.  
10 Counsel to Karim Iskander Bayyouk  
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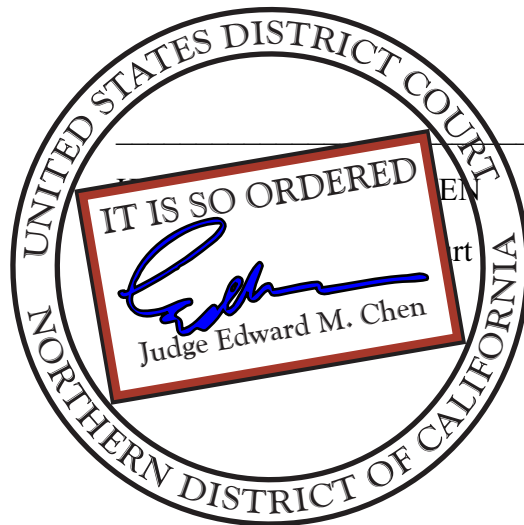
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1 **~~[PROPOSED]~~ ORDER EXCLUDING TIME**

2 PURSUANT TO STIPULATION, IT IS HEREBY ORDERED that:

3 The ends of justice are served by finding that the exclusion of time under the speedy trial  
4 rules from September 10, 2012 until December 19, 2012 is appropriate to permit defense counsel  
5 the reasonable time necessary for effective preparation, taking into account the exercise of due  
6 diligence, and, under the circumstances, this exclusion serves the ends of justice and outweighs  
7 the best interests of the public and the defendant in a speedy trial and the prompt disposition of  
8 criminal cases. Therefore the Court concludes that the exclusion of time from September 10,  
9 2012 until December 19, 2012 should be made under Title 18, United States Code, Sections  
10 3161(h)(7)(B)(iv).

11 DATED: 11/29/12



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